

May 4, 2022

Technical Advisory Committee
Shingle Creek and West Mississippi
Watershed Management Commissions
Hennepin County, Minnesota

The agendas and meeting packets for both the TAC and regular meetings are available to all interested parties on the Commission's web site at <http://www.shinglecreek.org/tac-meetings.html> and <http://www.shinglecreek.org/minutes--meeting-packets.html>

Dear Members:

A joint regular meeting of the Shingle Creek and West Mississippi Watershed Management Commissions will be held **Thursday, May 12, 2022**, at 12:45 p.m., in the downstairs Community Room in Crystal City Hall, 4141 Douglas Drive..

The Technical Advisory Committee (TAC) will meet prior to the regular meeting at 11:30 a.m.

Meetings remain open to the public via the instructions above.

Please email me at judie@jass.biz to confirm your attendance at the TAC meeting and if you will be staying for lunch. Thank you.

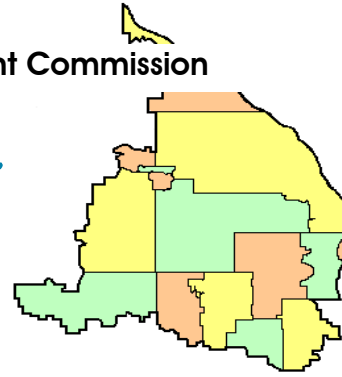
Regards,



Judie A. Anderson
Administrator

cc:	Alternate Commissioners	Member Cites	Troy Gilchrist	TAC Members
	Stantec	BWSR	MPCA	Met Council

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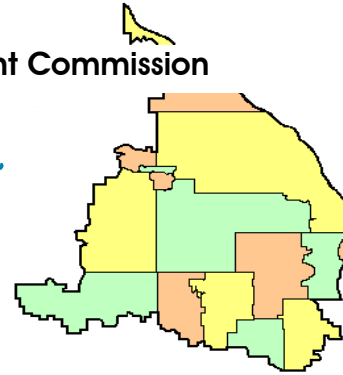
A meeting of the joint Technical Advisory Committee (TAC) of the Shingle Creek and West Mississippi Watershed Management Commissions is scheduled for **11:30 a.m., Thursday, May 12, 2022**, in the Community Room at Crystal City Hall..

May 12, 2022

A G E N D A

1. Call to Order.
 - a. Roll Call.
 - b. Approve Agenda.*
 - c. Approve Minutes of Last Meeting.*
2. Fourth Generation Plan Updates.*
 - a. Boundary Adjustments.
 - b. Diversity and Inclusion Workshop.
 - c. Education and Outreach Framework.
 - d. Implementation Plan.
3. WBIF Convene Committee Recommendations.*
4. Shingle Creek Maintenance Levy.*
5. Impaired Waters Status.*
6. Other Business.
7. Next TAC meeting is scheduled for June 9, 2022.
8. Adjournment.

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MINUTES
April 14, 2022

A meeting of the Technical Advisory Committee (TAC) of the Shingle Creek and West Mississippi Watershed Management Commissions was called to order by Acting Chair Mark Ray at 11:30 a.m., Thursday, April 14, 2022, at Crystal City Hall, 4141 Douglas Drive, Crystal, MN.

Present: Mitchell Robinson, Brooklyn Park; Heather Nelson, Champlin; Mark Ray, Crystal; Derek Asche, Maple Grove; Liz Stout, Minneapolis; Nick Macklem, New Hope; Amy Riegel, Plymouth; Diane Spector, Ed Matthesen, and Ali Stone, Stantec; and Judie Anderson, JASS.

Not represented: Brooklyn Center, Osseo, and Robbinsdale.

Also present: Burt Orred, Jr., Crystal; Karen Jaeger, Maple Grove; Ray Schoch, Minneapolis; John Roach, Osseo; Andy Polzin, Plymouth; and Kris Guentzel, Hennepin County Dept. of Environment and Energy (HCEE).

- I. Motion by Riegel, second by Stout to **approve the agenda**.** Motion carried unanimously.*
- II. Motion by Riegel, second by Robinson to **approve the minutes*** of the March 10, 2022, meeting.*Motion carried unanimously.*
- III. **Fourth Generation Watershed Management Plan.** Included in Staff's April 8, 2022, memo* were three items regarding public outreach:

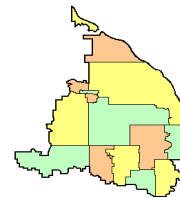
A. Equity in Watershed Management Workshop, Monday, April 25, 6-8 pm at the Crystal Community Center. Hennepin County Commissioner Irene Fernando will be the host. Several speakers will talk about strategies for enhanced inclusion and equity in our work as stewards of natural and water resources in the watersheds, and there will be an opportunity to break out into small groups to share thoughts and ideas.

B. Citizen Advisory Committee (CAC) Meetings. Cities have started holding their first meetings with citizen commissions. The initial meeting is focused on providing an overview of the WMOs and what they do and have achieved, to explore the issues residents think are important, and get feedback about preferred methods of communication. The second meeting, in a few months, will review and get feedback on the specific strategies and actions cities will be focusing on over the next ten years.

C. Other Public Input. Over the next several weeks Staff will be developing and publishing a series of short online surveys to obtain further input. Their plan is to disseminate the links to these surveys using city websites and social media, as well as social media and email lists that lake associations use to stay connected.

1. What are some things you'd particularly like to know?
2. Do you have some suggestions for obtaining additional feedback?

The memo also included a listing of future CAC meetings.



IV. Capital Improvement Program (CIP). Staff's April 8, 2022, memo* includes tables showing the Commissions' current CIPs and suggested revisions. For each of the Commissions, most of the projects are either generic placeholder projects that await further definition when something comes up, or they are projects that still are not ready for implementation and just keep getting pushed back year to year.

Currently, the projects definitely going forward are the Cost Share and Partnership Cost Share Programs. There has been some interest in pursuing the following, although nothing specific is pending:

A. The Minneapolis Park Board (MPRB) may be interested in partnering on some Shingle Creek restoration projects along Shingle Creek and Creekview Parks, from the Queen Avenue bridge to 49th Avenue N, or even down to Webber Park. The MPRB has improvements scheduled in those parks in the next five years, which may be an opportune time to proceed.

B. There has been some interest in a stabilization project on Bass Creek in New Hope and Brooklyn Park, from TH 169 to Cherokee Drive.

C. We've also had some very early talks with Brooklyn Park about a natural channel design project on Shingle Creek in Brookdale Park, from the end of the Connections project to Xerxes Avenue.

D. The next lake likely in line for internal load management is Eagle Lake, which could be combined with improvements on Pike Lake, which is connected to Eagle via a channel. However, no feasibility study has been done to determine what those improvements might be.

Each of these are consistent with the generic stream restoration or lake internal load projects and could be initiated likely without a minor plan amendment because they are in the text of the Plan as "possible locations." Unless any of the cities or the Commissions have an additional project to be added to the CIP, at this point it appears that there will be no need for a Minor Plan Amendment to revise the CIP this year.

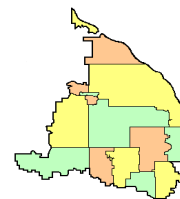
V. 2022 Rules and Standards Minor Plan Amendment. The Technical Advisory Committee (TAC) previously reviewed proposed revisions to the Commissions' Rules and Standards at several past meetings. Staff's April 8, 2022, memo* contains a final review of the proposed revisions to the Commissions' Third Generation Plan. These revisions necessitate a proposed Minor Plan Amendment (MPA).

The proposed Amendment would revise Appendix C of the Plan - the Rules and Standards - to (1) make the rules consistent with the most recent Minnesota General Stormwater Permit; and (2) make other various housekeeping revisions to the Rules.

If the TAC chooses to recommend to the Commissions to go forward with the Minor Plan Amendment, Staff recommend setting May 12, 2022, as the public meeting at which it would be discussed. At that May 12 meeting, the Commissions would discuss and act on the proposed revisions. If approved, the revised Rules could go into effect June 1, 2022, or some other date if preferred.

The proposed Notice of Minor Plan Amendment is included in Staff's memo. The Commissions must send a copy of the proposed MPA to the member cities, Hennepin County, the Met Council, and the state review agencies for review and comment, and must hold a public meeting (not a hearing) to explain the amendment. This meeting must be public noticed twice, at least seven and 14 days prior to the meeting.

Motion by Ray, second By Stout to recommend to the Commissions the commencement of the MPA process as described above. *Motion carried unanimously.* On page 15 of the packet, in the first line of (iii), the words "not feasible" will be replaced with the words "not advisable."



VI. 2022-2023 Watershed-Based Implementation Funding (WBIF) Convene Meeting.

A. Present were Riegel and Robinson representing the member cities, Schoch, representing the Shingle Creek Commission, Jaeger, representing the West Mississippi Commission, Guentzel, representing Hennepin County as the Soil and Water Conservation District, and Spector, serving as the facilitator.

B. At this meeting members continued to discuss potential opportunities for funding and began to develop priorities and strategies to guide the selection process. Funding inputs from a subgroup of city representatives and a table of potential general activities was included in Staff's April 8, 2022, memo.*

The amount allocated to the Shingle Creek Watershed Area is \$95,501, and to West Mississippi is \$75,000, which will become available July 1, 2022, and expire December 31, 2025. Funding must be focused on prioritized and targeted cost-effective actions with *measurable water quality results* that were identified in the implementation section of a state-approved and locally adopted comprehensive watershed management plan. A ten percent match is required for each activity.

C. For Shingle Creek, it was suggested to allocate \$60,000 funding for subwatershed assessments, including lake feasibility studies, and \$35,501 funding for education and public outreach. For West Mississippi, funding for subwatershed assessments of \$65,000 and funding for education and public outreach of \$10,000 was suggested. Motion by Riegel, second by Schoch to recommend these funding amounts to the Commissions. *Motion carried.*

D. There being no further business, the Convene meeting was adjourned at 12:44 p.m.

VII. Other Business.

A. The **next meeting** is scheduled for 11:30 a.m., May 12, 2022, prior to the regular Commission meetings.

B There being no further business, the Technical Advisory Committee meeting was adjourned at 12:45 p.m.

Respectfully submitted,

Judie A. Anderson
Recording Secretary
JAA:tim

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To: Shingle Creek/West Mississippi WMO Commissioners

From: Todd Shoemaker, P.E.
Diane Spector
Katie Kemmitt

Date: May 6, 2022

Subject: Fourth Generation Plan Update

Recommended Commission Action	For discussion and input.
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There are four topics to discuss today regarding the Fourth Generation Plan:

- Boundary Adjustments
- Diversity and Inclusion Workshop Outcomes
- Education and Outreach Framework
- Implementation Plan Development

Boundary Adjustments

Staff and the cities have been aware for many years that there are discrepancies between the watershed legal boundary and hydrological boundary. Among the reasons why 1) the boundaries were initially drawn using 10-foot topo. The more recent 2-foot topo allows a more accurate hydrologic boundary delineation. 2) When the boundaries were drawn, a number of the parcels on the periphery of the watersheds were large lot agriculture or rural residential, and those have since been subdivided and in some cases the hydrology has been changed as a result of mass grading done with development. 3) We do not have a watershed-level hydro boundary for West Mississippi but could assemble one from city H & H models. In response to a series of requests from one property owner in particular, we have had some discussion with local staff and the Commission's attorney about the advisability of updating the boundaries, which also impact Bassett Creek and Elm Creek. At this level we agreed that it was not cost-effective to complete a boundary change to accommodate one parcel. However, a wholesale rewriting of the boundaries (and establishing a hydro boundary for WM) would be a significant undertaking (see attached figure). Is there value to pursuing this further?

Diversity and Inclusion Workshop

This workshop was held on April 25, 2022 at the Crystal Community Center and hosted by County commissioner Irene Fernando. There were about 35 attendees, a good mix of Shingle Creek, West Mississippi, and Bassett Creek Commissioners and TAC members, some county staff, and representatives from a few other WMOs. The workshop included presentations by County, Metro Blooms, and Mississippi WMO staff, personal reflections on Environmental Justice work by the Executive Director of a nonprofit that serves diverse and underrepresented communities, as well as small group discussions and reflections.

Some of Diane's key takeaways are 1) the work is most successful when all parties spend time to build relationships and build trust, which can be resource-intensive and time consuming but is ultimately rewarding; and 2) environmental justice must be intentional and can challenge us to look at our actions in a new and sometimes uncomfortable way. One challenge is the extent to which our water resources work

can move beyond a strict “where the science says” approach to “where we can mitigate disproportionate impacts.”

At the end of the workshop the attendees broke into two groups – Bassett Creek and Shingle Creek/West Mississippi. There was a spirited discussion about how the Commissions could use their resources to improve conditions in historically underserved areas. Those present reacted thoughtfully to some slides presented by Hennepin County about where those potentially disproportionate impacts might be in the three watersheds, and we will review those at the 5/12 meeting. A few are attached.

Education and Outreach Framework

Many of the city CACs are identifying the need to provide more education and outreach opportunities within the two watersheds. As noted in the WBIF funding discussion, WMWA and Hennepin County have been working together to develop a shared half-time position specifically to provide hands-on outreach to property owners. A very rough framework for education and outreach to start our discussion is:

1. General education and outreach on key messages shared through the website, social media, written materials, press releases, and WMWA.
2. Youth education through WMWA’s Watershed PREP.
3. Adult education and outreach through WMWA’s Watershed PREP, focused on tabling and association workshops.
4. Adult education and outreach through new shared outreach coordinator, focused on workshops and hands-on BMPs.
5. Outreach to diverse communities through Metro Blooms and Partnership Grants hands-on BMPs.

At the 5/12 meeting we would like to discuss any additional ideas the Commissioners or TAC may have so we can start fleshing out this component.

Implementation Plan Development

Staff are going to begin sketching out the individual lake and stream resource plans that will help to define both the monitoring program and the implementation plan. As a part of this we will be identifying where such future work as 1) lake internal load feasibility studies; 2) subwatershed assessments; and 3) targeted monitoring might be helpful in the coming ten years.

We will also be sending out to the TAC a request for projects to be considered for the CIP in the coming ten years. We will be collecting this information over the next month and will have a compilation at the June meeting.

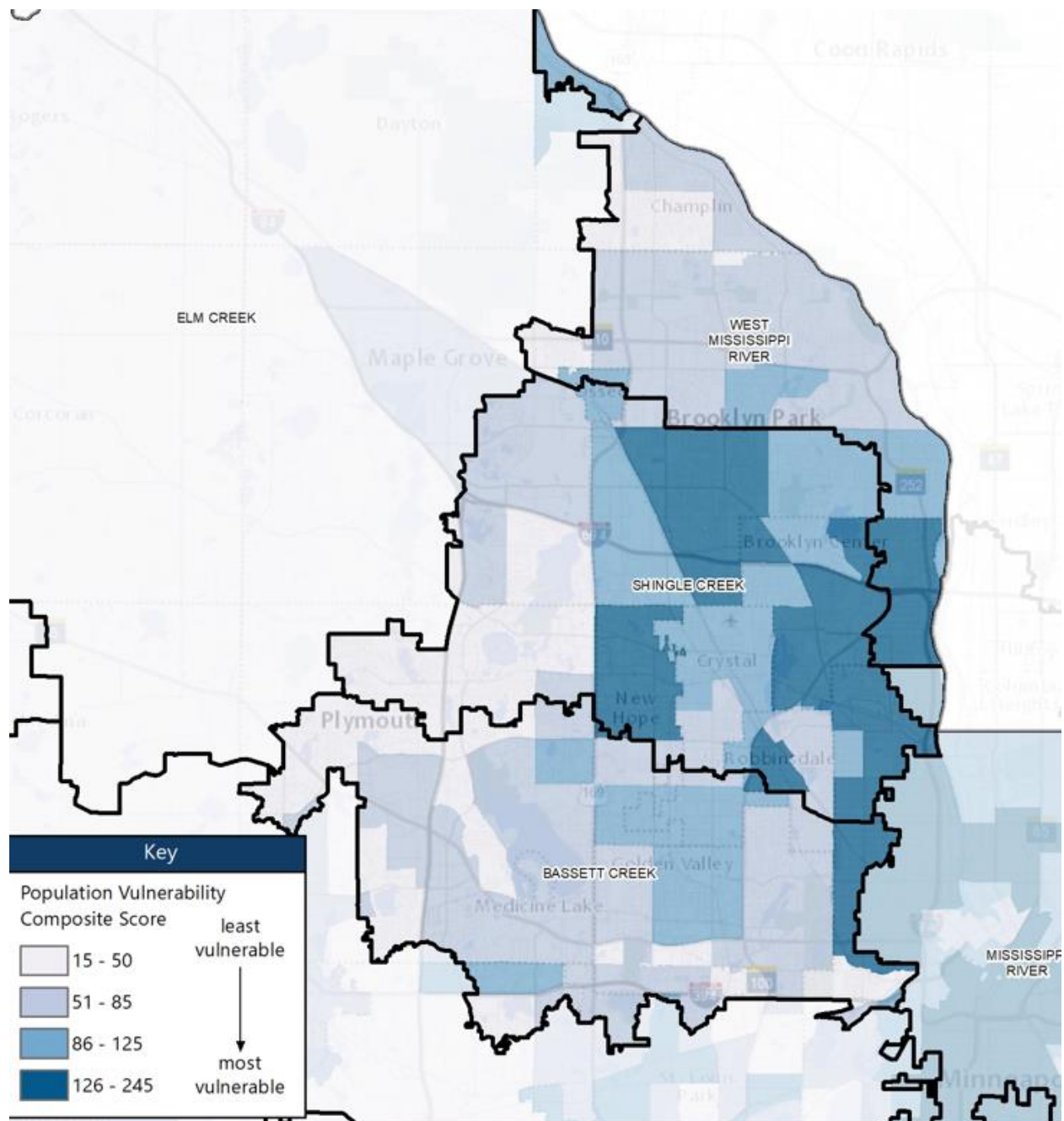


Figure 1. Location of potentially vulnerable populations based on composite of 14 variables (2010 Census). Source: Hennepin County.

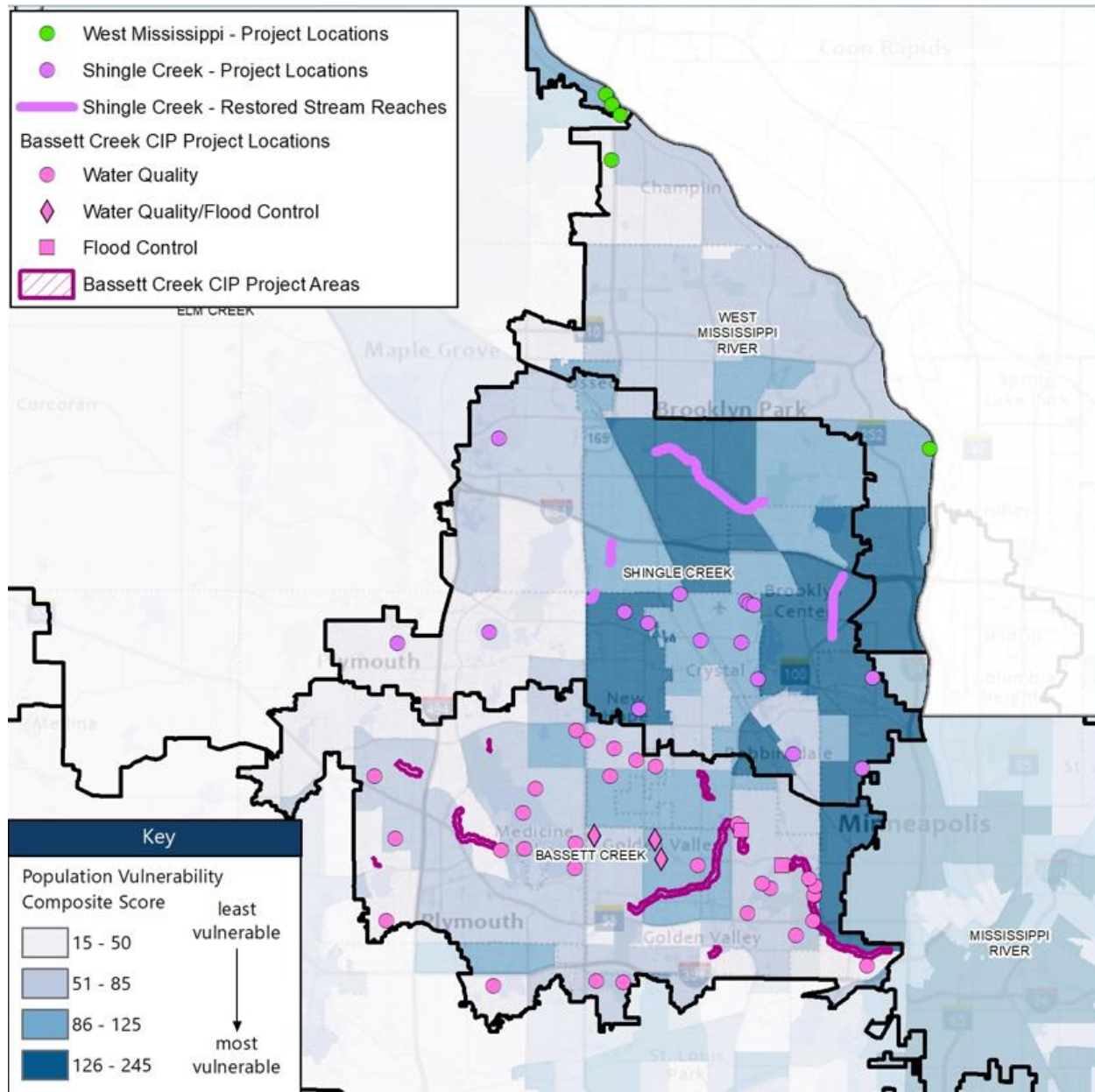
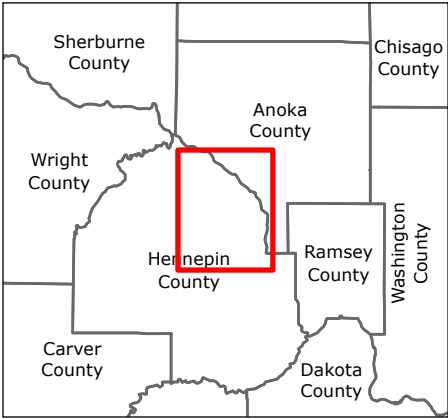
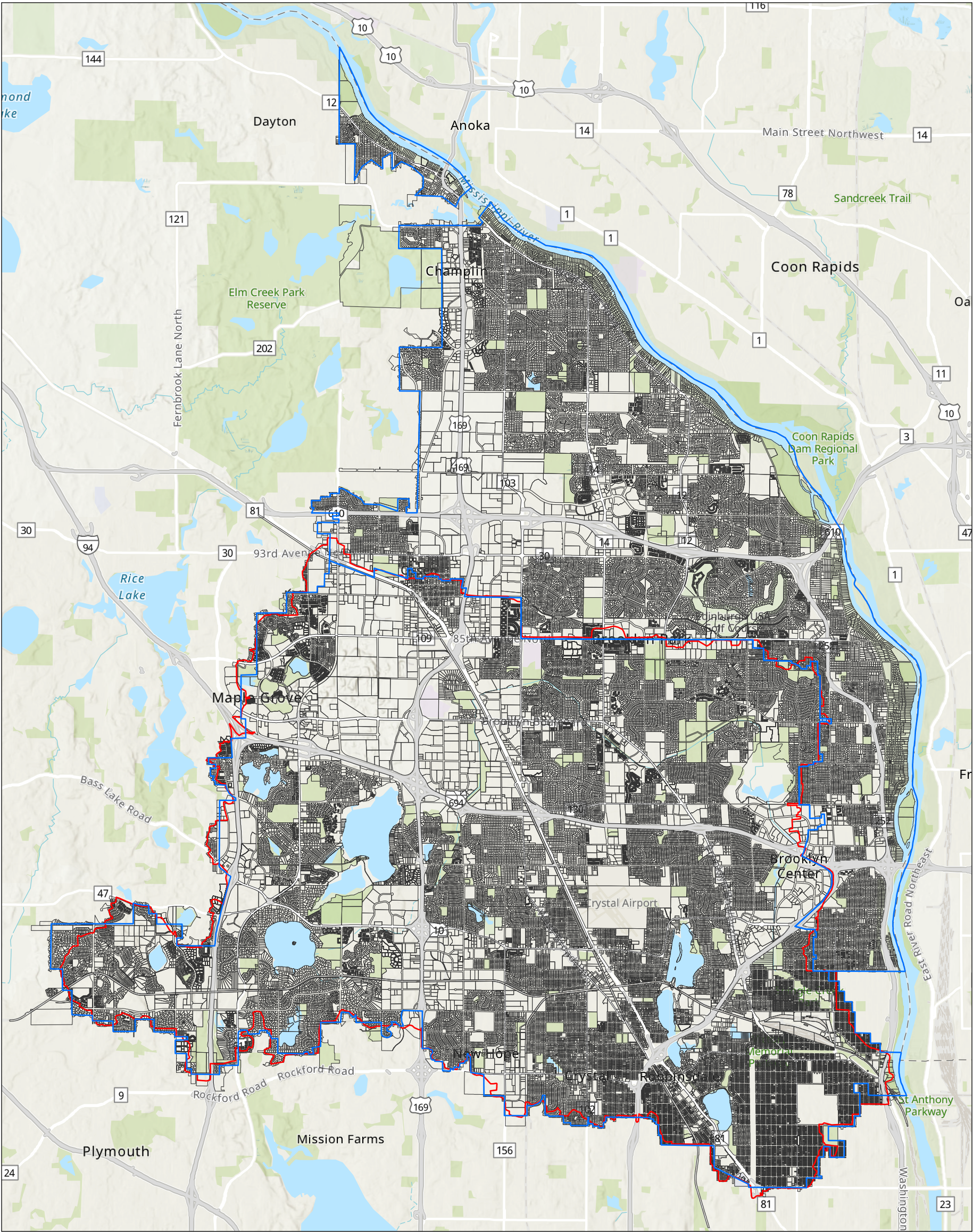


Figure 2. Location of recent WMO-funded water quality and flood control projects compared to location of vulnerable populations. Source: Hennepin County.



Notes
1. Coordinate System: NAD 1983 UTM Zone 15N
2. Data Sources: ESRI, Hennepin County, SCWC
3. Background: ESRI Topographic Basemap

Legend
SC Hydrologic Boundary
SCWM Boundary
Tax Parcels

0 3,250 6,500 Feet
(At original document size of 11x17)
1:78,000



Project Location
Hennepin Co., MN
Client/Project
Shingle Creek & West Mississippi
Watershed Management Commissions

Prepared by ARH on 2022-04-19
TR by XXX on 2020-XX-XX
IR by XXX on 2020-XX-XX
227704733

Figure No.
1
Title
SCWM Boundary

To: Shingle Creek/West Mississippi WMO Convene Committee

From: Diane Spector

Date: May 6, 2022

Subject: WBIF Convene Committee Report

**Recommended
Commission Action**

Discuss and recommendation to the Commissions.

The Watershed Based Implementation Funding (WBIF) committee met for its second convene meeting on April 14, 2022 concurrent with the Technical Advisory Committee (TAC) meeting.

The group reviewed potential actions identified for possible funding, including projects programmed in the CIP for the next few years, TMDL actions such as lake internal load feasibility studies or aquatic vegetation/rough fish management, and education and outreach options.

Spector noted that WMWA had been working with Hennepin County staff about the possibility of a shared staff member that could provide education and outreach within the four WMWA watersheds. The County was fleshing out the possibilities and what the cost would be, which they thought would be in the vicinity of \$100,000 per year. The expectation is that this staff person would be available to provide targeted workshops, on-site consultations, and targeted outreach on various water quality topics.

Since the last convene meeting, Hennepin County has drafted a proposed “Education, Outreach, and Technical Assistance Action Plan” that would initially dedicate 0.5 FTE in a 2-year limited duration employee position to implement this initiative across areas of the county that are contributing financially. The purpose would be develop a pilot program to increase technical assistance, education, and outreach with residents focused on increasing conservation implementation success. This pilot program would be focused on marketing and promoting workshops, reaching out to underserved communities, potentially delivering workshops, and providing follow-up assistance to workshop participants. It is possible that this could be developed in tandem with Metro Blooms to incorporate their expertise, especially in outreach to underserved groups. A component could also include providing small financial assistance grants to parties installing BMPs, which would be administered by this position. The convene group agreed to dedicate WBIF funds for education and outreach: \$35,501 from the Shingle Creek allocation, and \$10,000 from the West Mississippi allocation.

The group also discussed funding actions such as additional subwatershed assessments that would identify more projects that could then be incorporated into future capital projects for funding by grants and levy. The convene group agreed to dedicate \$60,000 from the Shingle Creek allocation to subwatershed assessments, with two areas in particular identified: the drainage area to the Gaulke/ Memory Lane/ Hagemeister Pond system; and the drainage area to Eagle Lake, including an internal load assessment for Eagle Lake.

Finally, the group agreed to dedicate the remaining \$65,000 in West Mississippi allocation to continuing to refine and design the high priority Mississippi River streambank stabilization needs in Brooklyn Park, for which the City and Hennepin County had completed a feasibility assessment. The purpose of the WBIF funding would be to take these from conceptual design to 30% design to improve project readiness for future grant funding.

Summary and Action

BWSR has developed the suggested convene meeting process set forth below, showing the convene committees' progress:

1. The amount allocated to the Shingle Creek Watershed Area is **\$95,501, and to West Mississippi is \$75,000**, which will become available July 1, 2022 and expire December 31, 2025. Funding must be focused on prioritized and targeted cost-effective actions with *measurable water quality results* that were identified in the implementation section of a state approved and locally adopted comprehensive watershed management plan.
2. The BWSR-Recommended Convene Meeting Process:
 - a) Choose a facilitator. **(Selected SCWM WMC)**
 - b) Choose a decision-making process. **(Selected consensus)**
 - c) Decide how to select activities for funding. Note that partnerships may also want to choose funding targets for different categories (e.g., projects, studies, education). **(Reviewed several categories of potential funding, including CIP, TMDL implementation, SWAs and Education and Outreach)**
 - d) Select the highest priority, targeted, measurable, and eligible activities to be submitted to BWSR as a budget request. **(Made recommendations.)**
 - e) Confirm which entity will serve as grantee and/or fiscal agent for each selected activity and decide on the source of the 10% required match.

Funding Priority	Amount WBIF	Source of 10% Match	Grantee
Shingle Creek			
Education & outreach contracted coordinator	\$35,501	Operating budget for E & O	SC WMC
Subwatershed assessments	\$60,000	Operating budget for SWAs	SC WMC
TOTAL	\$95,501		
West Mississippi			
Education & outreach contracted coordinator	\$10,000	Operating budget for E & O	WM WMC
Miss R Streambank Stabilization Design	\$65,000	?	?
TOTAL	\$75,000		

Recommendation and Future Actions

Confirm the allocations and will identify and confirm the source of match and the grantees for each of the allocations. These will then be presented to the Commissions for review and agreement to serve as the grantee and provide the 10% match as noted. Note that the Hennepin County proposal for the Education and Outreach contracted coordinator is still under development and is still being considered by other WMOs for potential financial contributions from their WBIF allocations. Staff recommends you consider approving the allocations and funding levels in principle so that the process can move on to the next step.

Once all parties participating in the E & O coordinator proposal have agreed to the proposal and the actual contribution amount is known, any modifications to the above will be brought back to the convene committee and any modifications made. Staff acting as the convenor will then provide the final recommendation to BWSR for its review and approval. Once that has been secured, we will develop and submit work plans so funds can be contracted later this year.

To: Shingle Creek WMO Commissioners/TAC

From: Todd Shoemaker PE
Diane Spector
Katie Kemmitt

Date: May 6, 2022

Subject: Shingle Creek Maintenance Levy

**Recommended
Commission Action**

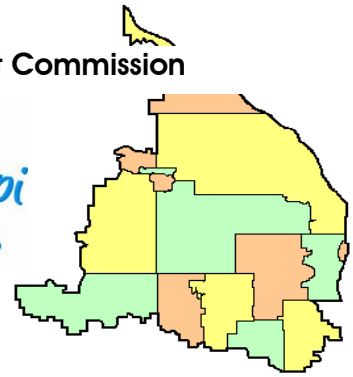
If BWSR determines a Minor Plan Amendment is necessary to include this in the levy certified this fall, then direct staff to work with BWSR to craft a MPA and set June 9, 2022, as the date of a Public Meeting to consider its adoption.

Over the past few months, the Commission, TAC, and staff have discussed options for funding “maintenance” types of activities that are not capital projects and not city maintenance, but are often the ongoing remnants of capital projects. As we’ve discussed before, these are activities such as ongoing long-term efforts to manage carp or curly-leaf pondweed, which would be the largest need, but also maintenance of fish barriers or BMPs installed as research projects, etc. There is no specific designated funding source for these types of activities.

Since this is not funding for a capital project as a separate line item on the CIP or smaller BMPs funded through the Cost Share programs, it is unclear whether a Minor Plan Amendment is necessary to initiate this new program. In many ways it is like an operating budget line item, but funded from levy rather than city assessments. Staff has been in contact with BWSR to determine if an MPA is necessary before the Commission chooses to certify a levy for this purpose. As of this writing, we do not have that determination.

If an MPA is required to modify the Third Generation Plan to reflect this new program, then we recommend you direct staff to craft an amendment that would be to BWSR’s satisfaction and then proceed with the standard MPA process of publishing notice and discussing the proposed MPA at a public meeting on June 9, 2022. At that time you would adopt the MPA and attached policy. If no MPA is necessary, then at the June meeting you would simply adopt the attached policy and include the requested amount in the notice of maximum levy you adopt at the meeting.

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**Shingle Creek
Watershed Management Commissions
Maintenance Funding Guidelines**

The Shingle Creek and West Mississippi Watershed Management Commissions undertake projects that aim to improve water resources in the watersheds. Projects are taken on by the Commissions directly or by member cities, with cost-share provided through the Capital Improvements Program (CIP) or the small BMP Cost-Share Program. Maintenance, repair, or replacement of Commission-led projects is often ongoing and necessary to continue providing water quality benefits in the watershed. The Commissions will allocate up to \$50,000 per year to complete maintenance activities not already taken on by member cities that fall under the classifications described below.

Projects that will be considered for Commission funding under the Maintenance Funding policy fall into two categories as follows:

1. Actions to maintain water quality benefits following Commission-led projects such as but not limited to:
 - Annual rough fish maintenance management
 - Rough fish barrier cleaning, repair, and maintenance
 - Whole-lake invasive aquatic vegetation management treatments performed for water quality, excluding those for recreation, aesthetics, or navigation and with DNR concurrence
 - Alum treatment touch-up
 - In-lake vegetation transplanting efforts
 - Research BMP maintenance (e.g., biochar and iron-enhanced sand filters constructed under Watershed projects)
2. Other actions that do not fall within the above category, evaluated on a case-by-case basis by the TAC and recommended to the Commissions.

Actions that will not be considered include any city actions for meeting National Pollutant Discharge Elimination System (NPDES) permit requirements; other activities that are clearly city responsibilities including pond dredging, street sweeping, and removing terrestrial invasive vegetation; and project-related operations and maintenance to which the city previously agreed such as debris removal and bank stabilizations related to stream restoration projects.

All candidate actions will be reviewed by the TAC and recommended to the Commissions for approval. Unallocated funds will carry over from year to year and be maintained in a designated fund account.

DRAFT February 2022

Adopted:

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To: Shingle Creek/West Mississippi WMO Commissioners/TAC

From: Diane Spector

Date: May 6, 2022

Subject: Impaired Waters Status

**Recommended
Commission Action**

For information.

I attended the MPCA/DNR Mississippi River - Twin Cities HUC 8 Watershed Professional Judgement Group (PJG)– WEST meeting on 4/28/22. This is a step in the process where the MPCA and DNR's watershed assessment team reviews water quality and other data to determine which streams and lakes are meeting or exceeding state standards, as well as identifying where more information is needed. The purpose of the PJG meeting is to take local and public input on potential new impairments, new delistings, those waterbodies that are recognized as nearly or barely impaired, and those that are vulnerable. This includes assessment results from monitoring chemical parameters as well as from biological monitoring of aquatic invertebrates and fish. The MPCA will use this information to develop and submit to the EPA a new draft Impaired Waters list, which is several steps further down the road in the process.

There is some good news and some not so good news.

- In West Mississippi, the MPCA is proposing new impairment listing on the channel that flows out of the Brooklyn Park **Environmental Preserve** through Mississippi Gateway Regional Park and discharges in the Mississippi River below the Coon Rapids Dam. The new impairment is for *E. coli*.
- The MPCA is proposing new impairment listings on **Bass Creek** – DO and *E. coli*. While this is a new impairment listing, recall that DO was a primary biotic stressor, and as such the Shingle and Bass Creek Biotic and DO TMDL includes non-numeric TMDL implementation actions for Bass Creek such as channel reshaping and adding aeration structures. Such features were included in the Bass Creek Park Restoration Project that is just finishing up. The Commission and cities have also been treating the Shingle Creek *E.coli* impairment as a whole-watershed impairment as well. It is not clear whether and when TMDL studies will need to be completed for these new impairments to formally establish load reductions, but there will not likely need to be new implementation actions since the cities and Commission are already in implementation.
- **Bass Lake** was noted to be now meeting the TP and Secchi standard, but still experiencing elevated chl-a, and there was a question as to whether it should be delisted at this time. We were able to provide some background to the PJG about the alum treatment and vegetation management activities that are ongoing, and that there was active management and oversight by the City, lake association, and the Commission. That was sufficient for the group to feel comfortable recommending that Bass Lake be proposed for delisting for nutrients. Yay!

- **Pomerleau Lake** now clearly meets state water quality standards for all three eutrophication indicators and it is recommended for delisting with no questions from the PJG. Yay again!
- There are a number of lakes this assessment round being proposed for listing based on non-attainment of the fish IBI standard. All three basins of **Twin Lake** are proposed as is **Eagle Lake**. I have a little information about which of the fish metrics seem to contribute to the low score, but the more complete actual IBI data can be readily obtained when it comes time to figure out what if anything to do about it.
- **Crystal Lake** was diagnosed with moderately elevated chloride concentrations and is classified as vulnerable to a future chloride impairment. No impairment at this time, just for information and consideration.